

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**ANGEL DAVID MORALES
VALLELLANES,
Plaintiff,**

v.

**JOHN POTTER, UNITED STATES
POSTMASTER GENERAL, ET ALS.,
Defendants.**

CIVIL NO. 97-2459 (GAG)(CVR)

**DAMAGES BASED ON
RETALIATION AND
DISCRIMINATION; PROHIBITED
PERSONNEL PRACTICES;
UNFAIR LABOR PRACTICES;
BREACH OF COLLECTIVE
BARGAINING AGREEMENT**

**MOTION FOR EXTENSION OF TIME TO
FILE A RESPONSE TO DEFENDANT'S MOTION UNDER FEDERAL
RULES OF CIVIL PROCEDURE 50(a) and (e)**

TO THE HONORABLE COURT:

COMES NOW, Plaintiff, Angel David Morales-Vallellanes, through the undersigned attorneys, very respectfully inform this Honorable Court:

1. Last Friday May 30th 2008 Defendant USPS filed a sixty (60) page motion under Rule 50(a) and (e) in the above captioned case.
2. The undersigned attorney has several hearings and a trial during this month and will take a ten (10) day vacation at the beginning of July.
3. The appearing party respectfully request until Wednesday July 23, 2008 a fifty (50) days term to file Plaintiff's response.

WHEREFORE, it is respectfully requested from this Honorable Court to authorize Plaintiff a fifty (50) days term until Wednesday July, 23, 2008 to file his response.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on June 4, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

S/MIGUEL E. MIRANDA-GUTIERREZ
MIGUEL E. MIRANDA-GUTIERREZ, ESQ.
ATTORNEY FOR PLAINTIFF
PO Box 192271
San Juan, Puerto Rico 00919-2271
TEL: (787) 282-0022
FAX: (787) 753-7655